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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

Nelson L. Bruce, Sui Juris)	
)	
Plaintiff)	Case No.: 2:19-cv-03456-BHH-BM
)	
- v -)	
)	PLAINTIFFS' REPLY AND
BANK OF AMERICA, N.A.)	OBJECTIONS TO DEFENDANT'S
(A.K.A. BANK OF AMERICA), et al.)	OPPOSITION TO PLAINTIFF'S
)	MOTION FOR ENLARGEMENT OF
Defendants.)	TIME
)	

COMES NOW Plaintiff Nelson L. Bruce, with his Reply and Objections to the Defendant Opposition to Plaintiffs motion for Enlargement of Time to File Amended Complaint. Plaintiff objects to the defendant's opposition in its entirety for the reasons specified in Plaintiff's Amended Verified Complaint pages 1 and 2 as justice does so require to seek redress against all parties who have violated the laws presented in the Amended Verified Complaint. Plaintiff did not have a draft of the amendment at the time because he was working on completing it in its entirety for full review of the court. The "good cause" for modifying the scheduling and granting the motion for enlargement of time to amend pleadings is: 1) it will save the current defendant, and plaintiff from being a part to another case for violation of the same laws, and this court would not have to combine the issues.; 2) other parties need to be served and enjoined in this case as a defendant who will need time to respond; 3) and because there is a motion filed to amend the pleading which can be considered as a request for leave of court to amend the pleadings pursuant to Rule 15 (a)(2). Should this court find that justice does not so require this amendment and there is no good cause to amend the complaint, Plaintiff reserves the right to have the statutes tolled from the date of receiving his

amended verified complaint and receipt of the denial to file his Amended Complaint as a new complaint and this court should proceed with the original complaint as they have scheduled.

CONCLUSION

For the reasons specified above, the plaintiff has satisfied the good cause standard and this court should grant plaintiffs motion and accept his Amended Verified Complaint and proceed to is summons against the new defendants to be enjoined in this case as defendants and issue scheduling orders as this court feels acceptable.

Date this 14th day of **August, 2020**.

RESPECTFULLY PRESENTED,

“Without Prejudice”

Nelson L. Bruce 8-14-2020

Nelson L. Bruce, Propria Persona, Sui Juris

“All Natural Rights Explicitly Reserved and Retained”

U.C.C.1-207/ 1-308, 1-103.6

c/o 144 Pavilion Street

Summerville, South Carolina 29483

Phone: 843-437-7901

Email: leonbruce81@yahoo.com